TROY LAW, PLLC

ATTORNEYS / COUNSELORS AT LAW

Tel: (718) 762-1324 troylaw@troypllc.com Fax: (718) 762-1342 41-25 Kissena Boulevard, Suite 119, Flushing, NY 11355

December 24, 2018

Via email and ECF

Paul A. Aloe David Saponara KUDMAN TRACHTEN ALOE LLP 350 Fifth Avenue, 68th Floor New York, NY 10118

Re: Motion Objecting to Sanction Order

1:15-cv-02215-CBA-VMS Guan v. Long Island Business Institute, Inc.

Counselors,

We represent the plaintiffs in the above-referenced matter. Please find attached to this letter:

- 1. Notice of Plaintiff's Motion Objecting to Sanction Order;
- 2. Declaration of John Troy in Support of Motion:
 - Exhibit 1 Computation of Reasonable Attorney Fees;
 - Exhibit 2 Paul H. Aloe Eastern District of New York attorney of record;
 - Exhibit 3 Paul H. Aloe Southern District of New York attorney of record;
 - Exhibit 4 David Saponara Eastern District of New York attorney of record; and
 - Exhibit 5 David Saponara Southern District of New York attorney of record.
- 3. Memorandum of Law in Support of Motion.

This motion is timely as it is filed within 14 days of the entry of the said Sanction Order, and in lieu of a motion for reconsideration of the same. Pursuant to Judge Amon's Individual Rules 3(A), this motion is made without a pre-motion conference, as the scheduling of a pre-motion conference after 14 days from the entry of the said Sanction Order could have resulted in loss of right to challenge that order.

The briefing schedule for this motion shall be governed by the Federal Rules of Civil Procedure Rule 6(c)(1), with Defendants' reply due by January 7, 2019 and Plaintiffs' reply due by January 14, 2019.

Respectfully yours, TROY LAW, PLLC

/s/ John Troy
John Troy
Attorney for Plaintiffs

cc: via ECF

all counsel of record